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Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;

16 OTTOMOTTO LLC; OTTO TRUCKING

17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR OPPOSITION TO
WAYMO'S MOTION FOR
CONTINUANCE OF TRIAL DATE**

19 the

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Uber Technologies, Inc. and
7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Opposition to Waymo’s Motion for
8 Continuance of Trial Date (the “Administrative Motion”). The Administrative Motion seeks an order
9 sealing highlighted portions of Defendants’ Opposition to Waymo’s Motion for Continuance of Trial
10 Date (“Uber’s Opposition”), the Declaration of Arturo J. Gonzalez, and Exhibits 1 and 15 thereto, as
11 well as the entirety of Exhibits 2-7, 10-14, and 16 thereto.

12 3. The portions of Uber’s Opposition marked in red boxes, the portions of Exhibit 15
13 highlighted in green, and the entirety of Exhibits 10-14 and 16 contain or refer to trade secrets and
14 confidential business information, which Waymo seeks to seal.

15 4. Uber’s Opposition (portions marked in red boxes in version filed herewith) and Exhibit
16 11 (entire document) contain, reference, and/or describe Waymo’s highly confidential and sensitive
17 business information. The information Waymo seeks to seal regards confidential analysis of
18 Waymo’s business, including financial details. I understand that this confidential business
19 information is maintained by Waymo as secret. The public disclosure of this information would give
20 Waymo’s competitors access to Waymo’s business strategy for its autonomous vehicle system. If
21 such information were made public, I understand that Waymo’s competitive standing would be
22 significantly harmed.

23 5. Uber’s Opposition (portions marked in red boxes in version filed herewith), Exhibits
24 12-14 and 16 (entire documents), and Exhibit 15 (green highlighted portions) contain, reference,
25 and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the
26 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, including
27 its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are
28 maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s

1 business (Dkt. 25-31). The public disclosure of this information would give Waymo's competitors
 2 access to descriptions of the functionality or features of Waymo's autonomous vehicle system. If such
 3 information were made public, I understand that Waymo's competitive standing would be
 4 significantly harmed.

5 6. Exhibit 10 (entire document) contains, references, and/or describes Waymo's highly
 6 confidential and sensitive business information. Such information includes internal confidential
 7 policies and details regarding Waymo's security measures and protocols. I understand that Waymo
 8 maintains this information as confidential. The public disclosure of this information would cause
 9 significant competitive harm to Waymo, as its security measures would become known to competitors
 10 who could use such information to Waymo's disadvantage.

11 7. Waymo's request to seal is narrowly tailored to those portions of Uber's Opposition
 12 and Exhibits 10-16 that merit sealing.

13
 14 I declare under penalty of perjury under the laws of the State of California and the United
 15 States of America that the foregoing is true and correct, and that this declaration was executed in San
 16 Francisco, California, on September 22, 2017.

17 By /s/ Felipe Corredor

18 Felipe Corredor
 19 Attorneys for WAYMO LLC

20
 21 **ATTESTATION**

22 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
 23 document has been obtained from Felipe Corredor.

24
 25 By: /s/ Charles K. Verhoeven
 26 Charles K. Verhoeven